

WOLF CREEK

NUCLEAR OPERATING CORPORATION

John A. Bailey
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Operations

January 22, 1992
NO 92-0028

U. S. Nuclear Regulatory Commission
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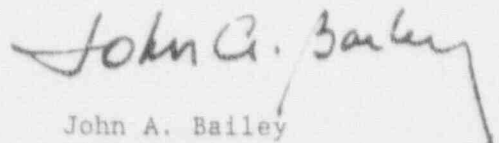
Reference: Letter dated December 23, 1991 from A. B. Beach, NRC to
B. D. Withers, WCNOC
Subject: Docket No. 50-482: Response to Violations 482/9131-01
and 482/9131-02

Gentlemen:

Attached is Wolf Creek Nuclear Operating Corporation's (WCNOC) response to violations 482/9131-01 and 482/9131-02 which were documented in the Reference. Violation 9131-01 involved a failure to make a timely NRC notification and violation 9131-02 involved an inadequate corrective action.

If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,



John A. Bailey
Vice President
Operations

JAB/jra

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Response to Violations 482/9131-01 and 482/9131-02

Violation (482/9131-01): Failure to Make Timely NRC Notification

Finding:

Title 10 CFR 50.72(b)(2)(ii) requires NRC notification as soon as practical and in all cases, within 4 hours of the occurrence, of any event or condition that results in manual or automatic actuation of any engineered safety feature, including the reactor protection system. However, actuation of an engineered safety feature, including the reactor protection system, that results from and is part of a preplanned sequence during testing or reactor operation, need not be reported.

Updated Safety Analysis Report (USAR) Sections 7.1.1.2.c and -e define the containment purge isolation and control room ventilation isolation systems, respectively, as emergency safety features actuation systems that are needed to actuate the equipment and systems required to mitigate the consequences of postulated accidents.

Contrary to the above, On October 2, 1991, the licensee failed to make a 10 CFR Part 50.72 notification within 4 hours for an automatic actuation of an engineered safety feature. Valid control room ventilation isolation and containment purge isolation signals were received when an operator reestablished a purge of the pressurizer relief tank. General Procedure GEN 00-007, Revision 4, "RCS Drain Down," which was referenced to reestablish the purge, did not identify the engineered safety feature actuation as a stated objective.

Reason for Violation:

Failure to make the timely notification resulted from a misinterpretation of the reporting guidelines. A caution statement had been added to Procedure GEN 00-007, "RCS Drain Down", to make Control Room operators aware that a CPIS/CRVIS might occur during venting of the pressurizer relief tank with the containment purge exhaust system secured. It was understood that by adding the caution statement, the occurrence of a CPIS/CRVIS resulting from this activity would be considered preplanned actuations. Subsequent discussion of the reporting requirements with the NRC Resident Inspector and NRC Region IV personnel concluded that the event was reportable because it occurred from a valid signal and the actuation was not a stated objective of the procedure.

Corrective Steps Which Have Been Taken And Results Achieved:

An event notification pursuant to 10 CFR 50.72(b)(2)(ii) was performed on October 18, 1991, with a subsequent event discussion in Licensee Event Report 482/91-018-00 on October 28, 1991. Wolf Creek Generating Station Standing Order 11, "NUREG 1022" was revised on October 24, 1991 to include further guidance detailing interpretation of what "preplanned" means in the context of NUREG-1022.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

No further actions are planned at this time. Action taken is sufficient to prevent recurrence.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 24, 1991.

Violation (482/9131-02): Inadequate Corrective Action:

Finding:

Criterion XVI of 10 CFR Part 50, Appendix B, "Corrective Actions," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunction, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. This is accomplished, in part, by Wolf Creek Nuclear Operating Corporation Procedure ADM 01-053, "Work Requests."

ADM 01-057, Section 2.1 states: "The work request will be used to: (A) document and control work performed on plant systems; and (B) identify, document, disposition, control and correct nonconforming items not under warehouse control."

Contrary to the above, a work request was not issued for Flow Transmitter EM FT-922. This flow transmitter was identified on June 28, 1991, as the cause of erroneous surveillance results for STS CV-210, Revision 5, "ECCS Inservice Check Valve Test." As a result of this deficient flow transmitter not being corrected, inaccurate flow data was obtained during the performance of STS EM-003, Revision 7, "ECCS Flow Balance," on November 8, 1991. FT-922 was found out of calibration following the test even though it had been calibrated 3 days earlier.

Reason for Violation:

On June 28, 1991, WCNOG was informed of a problem at the Callaway station regarding the verification of safety injection (SI) flow rates in accordance with Technical Specification 4.5.2h. Wolf Creek Generating Station (WCGS) Technical Specification 4.5.2h requires the performance of a flow balance test following completion of modifications to the emergency core cooling system subsystems that alter the subsystem flow characteristics and verification that the total pump flow rate is less than or equal to 665 gpm.

A Programmatic Deficiency Report (PDR) was initiated to evaluate the applicability of this problem to WCGS. The evaluation included a review of flow data for the SI pumps from the previous performance of STS CV-210, "ECCS Inservice Check Valve Test", and partial STS EM-003, "ECCS Flow Balance". On June 28, 1991 partial performance of STN IC-246A, "Calibration of Safety Injection Pumps A & B Discharge Flow Loops", was conducted to determine if flow transmitter EM FT-0922 for SI pump "B" flow was within tolerance. As a result of this test, EM FT-0922 was found to be out-of-tolerance. The evaluation indicated that this flow transmitter had a history of being out-of-tolerance.

The PDR concluded that the SI pump flows did not exceed the Technical Specification limits and was closed. In NRC Inspection Report 91-18, the inspector stated, "The decision to replace EM FT-0922 during the upcoming outage and to include additional acceptance criteria in STS CV-210 is being evaluated by PDR TS 91-028". The PDR failed to further evaluate the out-of-tolerance conditions for EM FT-0922 to determine if additional corrective action on the transmitter was necessary. As discussed below, a work request is not required to be issued in accordance with WCGS procedures.

Corrective Steps Which Have Been Taken And Results Achieved:

During the performance of STN IC-246A on June 28, 1991, EM FT-0922 AS FOUND data was outside the tolerance range as specified in the procedure. In accordance with Step 5.14 of the procedure the transmitter was adjusted within the tolerance range and STN IC-246A was completed. A work request was not initiated since adjustment was completed in accordance with STN IC-246A and there was no failure of the transmitter.

Procedure ADM 08-807, "I&C Group Surveillance Testing" requires out-of-tolerance conditions be identified in the Deficiency Section of the Surveillance Test Routing Sheet. The Shift Supervisor is to be immediately notified if the instrument cannot be brought back into tolerance or an Allowable Value has been exceeded. For any instrument failure encountered during the performance of a surveillance procedure, the test performer is required to initiate a work request to document the nonconformance. Procedure ADM 02-300, "Surveillance Testing" requires that when a test deficiency is identified, the test performer coordinates with the Shift Supervisor to determine the actions to be taken to resolve the deficiency. The actions to be taken may include termination or suspension of the test if the deficiency warrants, generation of a work request, request an engineering evaluation or other actions. Therefore, in accordance with the above procedure a test deficiency may not be a nonconformance as defined in ADM 01-057, "Work Request".

Procedure STN IC-246A was performed on September 4, 1991 and EM FT-0922 was within the required tolerance ranges. In preparation for performing STS CV-210, a partial performance of STN IC-246A was conducted on November 9, 1991. Transmitter EM FT-0922 AS FOUND data was outside the tolerance range and subsequently adjusted within the tolerance range in accordance with STN IC-246A. During the performance of STS CV-210 on November 8, 1991, a test deficiency was identified when SI pump "B" exceeded 665 gpm by 2.2gpm. Procedure STS EM-003 was performed to adjust the cold leg safety injection throttle valves to bring SI pump flow within the technical specification value. As a result of the test deficiency on

STS CV-210, a post test calibration was performed on EM FT-0922 AS FOUND data was outside the tolerance range. Corrective Work Request 6083-91 was initiated and transmitter EM FT-0922 was replaced on November 21, 1991 due to recurring calibration concerns.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

As discussed in letter WM 92-0002 dated January 6, 1992, WCNOG is continuing to enhance the corrective action program. In August 1991, a change was made to the corrective action program which revised the Programmatic Deficiency Report to the Performance Improvement Request. The intent of this change was to eliminate the confusion surrounding the definition of "programmatic condition - adverse to quality" and expand the scope of the program to include any condition that could adversely effect plant performance or work activities. A discussion of this event and the need to ensure that the condition is adequately addressed in a timely manner will be included as part of the corrective action program training being provided by July 1, 1992.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by July 1, 1992 with the completion of training on the corrective action program.